

THE HONORABLE BARBARA JACOBS ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TATIANA WESTBROOK, an individual;  
JAMES WESTBROOK, an individual; HALO  
BEAUTY PARTNERS, LLC, a Nevada Limited  
Liability Company,

Plaintiffs,

v.

KATIE JOY PAULSON, an individual;  
WITHOUT A CRYSTAL BALL, LLC, a  
Minnesota Limited Liability Company; and  
DOES 1 through 100, inclusive,

Defendants.

NO. 2:20-cv-01606-BJR

**DECLARATION OF HOPE WALKER  
IN SUPPORT OF PLAINTIFFS'  
OPPOSITION TO DEFENDANTS'  
MOTION TO DISMISS**

I, HOPE WALKER, hereby state as follows:

1. I am over the age of eighteen and am competent to testify to the facts alleged herein.

2. I am a resident of the State of Washington, and I live in the city of Bothell. I have been a resident of the State of Washington my entire life.

**DECLARATION OF HOPE  
WALKER -1**  
(2:20-CV-01606-BJR)

**CARROLL, BIDDLE, & BILANKO, PLLC**  
1000 2<sup>nd</sup> Avenue, Suite 3100  
Seattle, WA 98104

3. I was a supporter of Tatiana “Tati” Westbrook (“Tati”) from approximately 2017 through May 2019. Specifically, I would watch on a regular basis Tati’s monetized YouTube beauty guru videos that were published on her monetized YouTube channel, to which I was a subscriber.

4. I am aware that Tati has some ownership connection with, and operates, a company by the name of Halo Beauty Partners, LLC (“Halo”). I am also aware that Halo produces and sells in the State of Washington hair, skin and nails vitamins. Because I was fan of Tati, I purchased vitamins from Halo to try and had them sent to my Washington residence. I personally found Halo’s vitamins to be effective, as they worked very well for me, and in May 2019, I was preparing to purchase a subscription to Halo’s vitamins at \$40.00 per month.

5. In or about the end of May 2019, I started to watch videos on YouTube on a channel called Without A Crystal Ball, which features a person that goes by the name Katie Joy Paulson, and I eventually became a subscriber of that YouTube Channel.

6. In addition to watching Ms. Paulson’s videos on the YouTube channel Without a Crystal Ball and I also followed Ms. Paulson on her various Twitter accounts.

7. As a subscriber and follower of Ms. Paulson’s content on YouTube and other social media platforms that were broadcasted to—and I viewed in—the state of Washington, I personally saw Ms. Paulson’s social media postings and videos regularly attacking Mrs. Westbrook, her husband James Westbrook, and their company Halo. Two videos in particular that stood out to me are named: “Sephora Arrived at My house! And I’ll answer questions too,” and “The Past James & Tati Westbrook Dont want you to Know.”

8. Specifically, prior to viewing Ms. Paulson’s content, I thought Tati and James Westbrook were good people trying to do good things in the world, and that they had created a great product through Halo that I was able to afford and was happy to support in the state of Washington. However, my perception of Tati and James Westbrook changed drastically when I

1 saw that Ms. Paulson claimed in the above-mentioned videos and on her twitter account that she  
2 had done extensive research on James Westbrook and thereafter portrayed him as having  
3 personally taken out reverse mortgages on his mother's house to steal all of her equity in her own  
4 property, and as having removed his mother's oxygen in order to cause her untimely death so  
5 that he could steal her assets. Based upon Ms. Paulson's statements and social media posts on  
6 these topics, I believed Ms. Paulson's statements and representations as to her portrayal of James  
7 Westbrook, and by extension through marriage Tati, to be true.

8 9. Ms. Paulson's representations of James Westbrook, and by extension Tati, with  
9 regard to Mr. Westbrook's mother really affected me and caused me to develop negative feelings  
10 toward James Westbrook, Tati, and Halo, which then directly caused me to stop purchasing Halo  
11 vitamins. Specifically, I took care of my mother for many years before she passed away, and I  
12 know how difficult it is to make end-of-life and estate-related decisions. However, the way that  
13 Ms. Paulson described the behavior of Mr. Westbrook, and by extension Tati, was so appalling  
14 that I was completely turned off to Halo and did not want to support a business owned by a  
15 married couple that I was led to believe stole from a parent and caused the untimely death of a  
16 parent for inheritance purposes. As a direct result of Ms. Paulson's representations on this topic  
17 alone, I decided to go elsewhere for my vitamins, I unsubscribed from Tati's monetized  
18 YouTube channel, and I stopped watching Tati Westbrook's monetized videos.

19 10. I also note herein that I am aware of various YouTube controversies that have  
20 occurred involving Tati, including, but not limited to: "Dramageddon," "Karmageddon," and  
21 "Dramageddon 2.0." However, throughout all such controversies, I was never swayed to stop my  
22 support of Halo or Tati's monetized YouTube channel and videos. Rather, it was the specific  
23 allegations and representations that Ms. Paulson made in order to portray Mr. Westbrook as a  
24 person that obtained so many reverse mortgages on his mother's property that he stole all of the  
25 equity from her home, and that he caused her untimely death by personally removing his  
26

1 mother's oxygen so that he could steal her assets that exclusively impacted my decision to stop  
2 buying products from Halo and to stop watching Tati's monetized content on her monetized  
3 channel.

4 I declare under penalty of perjury under the laws of the United States of America that the  
5 forgoing is true and correct.

6  
7 SIGNED at Bellevue, Washington, on December 18, 2020.

8  
9  
10 \_\_\_\_\_  
11 Hope Walker  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26